



## GDPR Commitment – 1 Sep 2020

### Introduction

The EU European General Data Protection Regulation (“GDPR”) standardises data protection laws and processing across the EU; affording individuals stronger, more consistent rights to access and control their personal information.

The UK *Data Protection Act 2018* (“DPA”) is the UK’s implementation of the GDPR which came into force across the EU on 25th May 2018 and brought with it the most significant changes to data protection law in two decades. The GDPR gives member states limited opportunities to make provisions for how the law applies in their country – in the UK these are covered by the DPA. All references to data protection law relate to the GDPR, and consequently to the DPA, unless otherwise stated.

### Our Commitment to Data Protection

OX365 Limited (‘OX365’ ‘we’, ‘us’ or ‘our’) are committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. We have a robust and effective data protection program in place which complies with existing law and abides by the data protection principles laid out in the GDPR. We recognise our obligations in updating and expanding this program to meet the demands of the UK’s Data Protection Act and the GDPR.

OX365 are dedicated to safeguarding the personal information under our remit and operate a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for, the GDPR. Our objectives for data protection compliance are summarised in this statement and include the development and implementation of new data protection roles, policies, procedures, controls and measures to ensure maximum and ongoing compliance.

### Our Data Protection Role

OX365 act as Data Controllers and Data Processors of our own employee data and Business CRM data regarding Contacts and Clients and as Data Processors for services provided.

OX365 is registered as a Data Controller with the UK Information Commissioner’s Office (ICO), registration number: ZA456431.

OX365 takes the privacy and security of individuals and their personal information very seriously, and takes every reasonable measure and precaution to protect and secure the personal data that we process. We have robust information security policies and procedures in place to protect personal information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures.

## Data Protection Principles

OX365 have a consistent level of data protection and security for employees, customers, suppliers and third parties across our organisation, and have actively taken the necessary steps for compliance with data protection law, in accordance with the 7 Data Principles set out in the Data Protection Act 2018. These are:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

## Your data protection rights

Data subject rights are one of the key areas of change under the GDPR. OX365 have implemented procedures to help facilitate the exercise of the data subject's rights under this regulation. The rights of the data subject are:

- the right to be informed
- the right of access
- the right to rectification
- the right to erasure
- the right to restrict processing
- the right to data portability
- the right to object to processing
- the rights in relation to automated decision making and profiling

## How we have prepared for the GDPR

We have reviewed and updated our policies, including but not limited to, our Information Security Policy, Privacy Policy, Data Breach Policy and Subject Access Requests.

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We have undertaken a comprehensive data mapping of the personal data we store, manage, maintain, collect, control and process.

All third parties whose systems we use have reviewed for their compliance with GDPR and their ongoing commitments relation to the regulation.

A Director of the company has completed professional training and been awarded the PECB Provisional Data Protection Officer (GDPR) certification.

We have updated our legal documentation to ensure compliance and where necessary, our clients will receive enhanced documentation.

We have implemented enhanced security procedures and solutions, and will continue to implement solutions as appropriate.

We have provided initial training to our team around GDPR and are committed to scheduled and ongoing training as the regulation evolves.

## **GDPR Roles and Employees**

OX365 have designated the Information Security Officer as our Appointed Person with regard to the new data protection Regulation. The appointed person along with our Human Resources department are responsible for promoting awareness of the GDPR across the organisation, as well as ensuring that policies and procedures are adhered to and reviewed on a regular basis to ensure ongoing compliance.

OX365 understands that continuous employee awareness and understanding is vital to the continued compliance of the GDPR and have involved our employees in our preparation plans. We have implemented an employee training program which is provided to all employees and forms part of our induction and annual training program.

If you have any questions about our preparation for the GDPR, please contact us at [dataprotection@ox365.co.uk](mailto:dataprotection@ox365.co.uk)

## **Useful information about the GDPR and the UK Data Protection Act**

UK Information Commissioner's Office (ICO):  
<https://ico.org.uk/>

ICO Guide to the General Data Protection Regulation (GDPR)

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/>

Full text of the GDPR

<https://eur-lex.europa.eu/eli/reg/2016/679/oj>